

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO**

OHIO A. PHILIP RANDOLPH INSTITUTE,  
*et al.*

Plaintiffs,

v.

LARRY HOUSEHOLDER, Speaker of the  
Ohio House of Representatives, *et al.*

Defendants.

No. 1:18-cv-00357-TSB-KNM-MHW

Judge Timothy S. Black

Judge Karen Nelson Moore

Judge Michael H. Watson

Magistrate Judge Karen L. Litkovitz

**DECLARATION OF T. ALORA THOMAS IN SUPPORT OF  
PLAINTIFFS' MOTION IN OPPOSITION TO DEFENDANTS' AND INTERVENERS'  
MOTIONS FOR SUMMARY JUDGMENT**

I, T. Alora Thomas, declare that I am a Staff Attorney with the American Civil Liberties Union Foundation Voting Rights Project, and counsel to Plaintiffs in the above-captioned case. I submit this Declaration in support of Plaintiffs' Motion in Opposition to Defendants' and Intervenor's Motions for Summary Judgment. Based upon my work in this case, I have become familiar with and obtained knowledge of the documents that are attached to this Declaration. The following facts are within my personal knowledge, and, if called and sworn as a witness, I could and would testify competently to them.

1. **Exhibit A** is a true and correct copy of the sworn expert report of Mr. Cooper, dated October 5, 2018, and submitted as Exhibit 1 at the deposition of Mr. Cooper.

2. **Exhibit B** is a true and correct copy of excerpts of the deposition transcript of Mr. Cooper, taken on December 13, 2018.

3. **Exhibit C** is a true and correct copy of the expert report of Dr. Warshaw, dated October 5, 2018, and submitted as Exhibit 1 to Dr. Warshaw's deposition.

4. **Exhibit D** is a true and correct copy of the rebuttal expert report of Dr. Warshaw, dated November 26, 2018, and submitted as Exhibit 6 to Dr. Warshaw's deposition.

5. **Exhibit E** is a true and correct copy of the 2018 supplemental expert report of Dr. Warshaw, dated December 28, 2018.

6. **Exhibit F** is a true and correct copy of the 2018 supplemental expert report of Mr. Cooper, dated December 28, 2018.

7. **Exhibit G** is a true and correct copy of the expert report of Dr. Hood, dated November 12, 2018, and submitted as Exhibit 1 to Dr. Hood's deposition.

8. **Exhibit H** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Goldenhar, taken on November 30, 2018.

9. **Exhibit I** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Burks, taken on November 1, 2018.

10. **Exhibit J** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Inskip, taken on November 19, 2018.

11. **Exhibit K** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Libster, taken on October 25, 2018.

12. **Exhibit L** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Deitsch, taken on December 3, 2018.

13. **Exhibit M** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Boothe, taken on November 9, 2018.

14. **Exhibit N** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Griffiths, taken on December 6, 2018.

15. **Exhibit O** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Nadler, taken on November 30, 2018.

16. **Exhibit P** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Rader, taken on December 6, 2018.

17. **Exhibit Q** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Walker, taken on November 8, 2018

18. **Exhibit R** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Megnin, taken October 25, 2018.

19. **Exhibit S** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Harris, taken on November 9, 2018.

20. **Exhibit T** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Dagres, taken on October 24, 2018.

21. **Exhibit U** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Myer, taken on December 5, 2018.

22. **Exhibit V** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Hutton, taken on December 5, 2018.

23. **Exhibit W** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Thobaben, taken on November 19, 2018.

24. **Exhibit X** is a true and correct copy of excerpts of the deposition transcript of Plaintiff Rubin, taken on November 9, 2018.

25. **Exhibit Y** is a true and correct copy of excerpts of the deposition transcript of Ms. Miller, taken on November 16, 2018.

26. **Exhibit Z** is a true and correct copy of excerpts of the deposition transcript of Ms. Oberdorf, taken on November 15, 2018.

27. **Exhibit AA** is a true and correct copy of excerpts of the deposition transcript of Mr. Washington, taken on November 16, 2018.

28. **Exhibit BB** is a true and correct copy of excerpts of the deposition transcript of Ms. Jackson, taken on November 10, 2018.

29. **Exhibit CC** is a true and correct copy of excerpts of the deposition transcript of Mr. Simon, taken on November 1, 2018.

30. **Exhibit DD** is a true and correct copy of Exhibit 5 to Mr. Simon's deposition.

31. **Exhibit EE** is a true and correct copy of excerpts of the deposition transcript of Mr. Whatman, taken on November 14, 2018.

32. **Exhibit FF** is a true and correct copy of excerpts of the deposition transcript of Mr. Kincaid, taken on December 4, 2018.

33. **Exhibit GG** is a true and correct copy of excerpts of the deposition transcript of Mr. DiRossi, taken on October 22, 2018.

34. **Exhibit HH** is a true and correct copy of excerpts of the deposition transcript of Mr. Morgan, taken on November 28, 2018.

35. **Exhibit II** is a true and correct copy of email produced by the Republican National Conference bearing bates number REV\_00023234.

36. **Exhibit JJ** is a true and correct copy of Exhibit 5 to Mr. Stivers's deposition.

37. **Exhibit KK** is a true and correct copy of LWVOH\_0052431.

38. **Exhibit LL** is a true and correct copy of excerpts of the deposition transcript of Ms. Blessing, taken on October 24, 2018.

39. **Exhibit MM** is a true and correct copy of excerpts of the deposition transcript of Mr. Judy, taken on November 1, 2018.

40. **Exhibit NN** is a true and correct copy of excerpts of the deposition transcript of Dr. Hood, taken on December 17, 2018.

41. **Exhibit OO** is a true and correct copy of Exhibit 15 to Dr. Hood's deposition.

42. **Exhibit PP** is a true and correct copy of Exhibit 10 to Ms. Blessing's deposition.

43. **Exhibit QQ** is a true and correct copy of Exhibit 27 to Mr. Kincaid's deposition.

44. **Exhibit RR** is a true and correct copy of Exhibit 22 to Mr. DiRossi's deposition.

45. **Exhibit SS** is a true and correct copy of excerpts of the deposition transcript of Mr. Niehaus, taken on October 30, 2018.

46. **Exhibit TT** is a true and correct copy of excerpts of the deposition transcript of Mr. Faber, taken on December 7, 2018.

47. **Exhibit UU** is a true and correct copy of Exhibit 8 to Mr. Kincaid's deposition.

48. **Exhibit VV** is a true and correct copy of Exhibit 10 to Mr. Braden's deposition.

49. **Exhibit WW** is a true and correct copy of excerpts of the deposition transcript of Mr. Glassburn, taken on December 14, 2018.

50. **Exhibit XX** is a true and correct copy of excerpts of the deposition transcript of Mr. Huffman, taken November 13, 2018.

51. **Exhibit YY** is a true and correct copy of Exhibit 4 to Mr. Huffman's deposition.

52. **Exhibit ZZ** is a true and correct copy of Exhibit 6 to Mr. Faber's deposition.

53. **Exhibit AAA** is a true and correct copy of Exhibit 7 to Mr. Huffman's deposition.

54. **Exhibit BBB** is a true and correct copy of Exhibit 19 to Mr. DiRossi's deposition.
55. **Exhibit CCC** is a true and correct copy of excerpts of the deposition transcript of Mr. Batchelder, taken on December 11, 2018.
56. **Exhibit DDD** is a true and correct copy of Exhibit 17 to Mr. Huffman's deposition.
57. **Exhibit EEE** is a true and correct copy of Defendant Obhof's Responses to Plaintiffs' Second Set of Requests for Admission, dated November 9, 2018.
58. **Exhibit FFF** is a true and correct copy of excerpts of the deposition transcript of Dr. Warshaw, taken on November 30, 2018.
59. **Exhibit GGG** is a true and correct copy of a transcription of the Ohio House of Representatives' December 14, 2011 session.
60. **Exhibit HHH** is a true and correct copy of Dr. Niven's expert report, dated October 10, 2018, and submitted as Exhibit 1 to Dr. Niven's deposition.
61. **Exhibit III** is a true and correct copy of excerpts of the deposition transcript of Dr. Niven, taken on December 19, 2018.
62. **Exhibit JJJ** is a true and correct copy of Dr. Cho's expert report, dated October 5, 2018, and submitted as Exhibit 2 to her deposition.
63. **Exhibit KKK** is a true and correct copy of excerpts of the deposition transcript of Dr. Cho, taken on December 7, 2018.
64. **Exhibit LLL** is a true and correct copy of the 2018 supplemental expert report of Dr. Cho, dated December 28, 2018.
65. **Exhibit MMM** is a true and correct copy of the expert report of Dr. Handley, dated October 5, 2018, and submitted as Exhibit 1 to Dr. Handley's deposition.

66. **Exhibit NNN** is a true and correct copy of the errata report of Mr. Cooper, dated November 30, 2018, and submitted as Exhibit 6 to Mr. Cooper's deposition.

67. **Exhibit OOO** is a true and correct copy of Exhibit D-2 to the Appendix to Mr. Cooper's expert report, dated October 5, 2018.

68. **Exhibit PPP** is a true and correct copy of excerpts of the deposition transcript of Dr. Handley, taken on December 12, 2018.

69. **Exhibit QQQ** is a true and correct copy of the second supplemental expert report of Mr. Cooper, dated November 27, 2018, and submitted as Exhibit 9 to Mr. Cooper's deposition.

70. **Exhibit RRR** is a true and correct copy of excerpts of the deposition transcript of Dr. Brunell, taken on December 14, 2018.

71. **Exhibit SSS** is a true and correct copy of Plaintiff Boothe's Responses to Defendants' First Set of Interrogatories, dated August 27, 2018.

72. **Exhibit TTT** is a true and correct copy of Plaintiff Griffiths' Responses to Defendants' First Set of Interrogatories, dated August 23, 2018.

73. **Exhibit UUU** is a true and correct copy of Exhibit 8 to the deposition of Plaintiff Griffiths.

74. **Exhibit VVV** is a true and correct copy of Exhibit 3 to the deposition of Plaintiff Griffiths.

75. **Exhibit WWW** is a true and correct copy of Exhibit 4 to the deposition of Plaintiff Griffiths.

76. **Exhibit XXX** is a true and correct copy of Exhibit 6 to the deposition of Plaintiff Griffiths.

77. **Exhibit YYY** is a true and correct copy of Exhibit 1 to the deposition of Plaintiff Walker.

78. **Exhibit ZZZ** is a true and correct copy of Exhibit 2 to the deposition of Plaintiff Walker.

79. **Exhibit AAAA** is a true and correct copy of Plaintiff Rader's Responses to Defendants' First Set of Interrogatories, dated August 27, 2018.

80. **Exhibit BBBB** is a true and correct copy of Plaintiff Rader's Amended and Supplemental Responses to Defendants' First Set of Interrogatories, dated November 12, 2018.

81. **Exhibit CCCC** is a true and correct copy of true and correct copy of Plaintiff Megnin's Responses to Defendants' First Set of Interrogatories, dated August 27, 2018

82. **Exhibit DDDD** is a true and correct copy of excerpts of the deposition transcript of Mr. Jordan, taken on December 3, 2018.

83. **Exhibit EEEE** is a true and correct copy of Exhibit 5 to Defendant Oberdof's deposition.

84. **Exhibit FFFF** is a true and correct copy of Exhibit 12 to the deposition of Mr. Washington.

85. **Exhibit GGGG** is a true and correct copy of Exhibit 6 to the deposition of Mr. Simon.

86. **Exhibit HHHH** is a true and correct copy of Hamilton County Young Democrats' Supplemental Responses to Defendants' First Set of Interrogatories, dated December 14, 2018.

Dated: January 25, 2019

/s/ T. Alora Thomas-Lundborg  
T. Alora Thomas-Lundborg  
Staff Attorney, Voting Rights Project  
American Civil Liberties Union Foundation



125 Broad Street, 18th Floor  
New York, NY 10004  
(212) 549-2500  
athomas@aclu.org